

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ANTON F. LIVERPOOL
Plaintiff

19 CV 5527

v.

THE CITY OF NEW YORK

SHILO DRUG AND therapeutic counseling program

D.R. JACKSON DIRECTOR and head psychiatrist/clinician of Shilo therapeutic program

PAROLE OFFICER JOHN DOE #1

SHILO STAFF: JOHN DOE #2

SHILO STAFF: JANE DOE #1 et al

VERIFIED COMPLAINT FOR DAMAGES
AND INJUNCTIVE RELIEF

1. This is a § 1983 action filed by Plaintiff Anton Liverpool A out of STATE Detainee, alleging violation of his constitutional rights to receive medical care and seeking injunctive relief and money damages pursuant to the American's with disability's act and Rehabilitation Act. Plaintiff also alleges a violation of his eighth rights by the court's his attorneys and parole officer John Doe/SHILO Employees.

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II Jurisdiction

Jurisdiction of this court is invoked pursuant to 28 U.S.C § 1331 in that this is a civil action arising under the constitution of the UNITED STATES.

3. Jurisdiction of the court is invoked pursuant to 28 U.S.C. § 1343(a)(2) in that this action seeks to redress the deprivation, under color of state law, of rights secured by Acts of congress providing for equal rights of persons within the jurisdiction of the United States.

III. Parties

4. Plaintiff: Anton Liverpool at all times relevant was confined by the New York department of corrections at Riker's Island and the V.C.B.C. correctional facility then released to the supervision of the Shilo therapeutic program.

5. Defendant The city of New York at all times relevant is and was a contractor of the department of corrections an employer of the court's and parole officer John Doe in addition to lawyers representing Mr Liverpool at relevant times.

Defendant

6. Shilo Drug a therapeutic at all times relevant was and is in agreement with the court's and the city of New York to provide therapeutic treatment and case/counseling to incarcerated individuals released to their treatment while in their facility. Theirin under contract signed by Mr Liverpool.

7. Defendant: D.R. Jackson at all times relevant was the head and supervising psychiatrist at the Shilo therapeutic program.

8. Defendant parole officer John Doe^{#1} was a parole officer employed by the city of New York with in the division of parole, acting under the color of state law being sued in his individual capacity.

9. Defendant John Doe^{#2} at all times relevant was an employee at the Shilo drug and therapeutic program and is being sued in his individual capacity.

10. Defendant Jane Doe^{#1} at all times relevant was an employee at the Shilo drug and therapeutic program and is being sued in her individual capacity.

11. Defendant Jane Doe^{#2} at all times relevant was an employee at the Shilo drug and therapeutic program and is being sued in her individual capacity.

12. Defendant Alicia Briody was at all times relevant an attorney with the ~~brooklyn~~^{legal} aid services and is being sued in her individual capacity.

13. Defendant Jane Doe^{#3} at all times^{relevant} was an employee with the Queens legal aid Society and is being sued in her individual capacity.

14. Defendant Jane Doe^{#4} at all times relevant was an employee with the brooklyn defender's services and is being sued herein in her individual capacity.

I V. Exhaustion of Available Remedies

15. Plaintiff exhausted his administrative remedies before filing this complaint

V. Factual statement

16. on or about June to July²⁰¹⁶ plaintiff was released to the Shilo Drug and therapeutic program [wayth, 2th] in New York by the courts of Queens county NY and the department of corrections.

17. After an Intake interview with his assigned counselor plaintiff signed a contract stating that no physical contact is ~~allowed~~ between clients or clients and staff, whereupon exiting the facility he was inappropriately fondled on the buttox area by parole officer defendant John Doe, whereupon plaintiff reported the incident too defendant John Doe^{#2} and defendant Jane Doe^{#1}

18. After speaking with parole officer John Doe^{#1} shilo staff counselor/employee Jane Doe^{#1} came back and told plaintiff that parole officer John Doe^{#1} (one) thought I was one of his parolees and that I shouldnt make an issue of it that I should just leave it alone.

19. plaintiff made know too his queen's attorney Jane Doe^{#3} from the legal aid Society of the incident of inappropriate physical contact inappropriate touching by parole officer John Doe^{#1} too the wichen Jane Doe^{#3} failed as my attorney too notify the courts or inquier and enshure my safety in the program on my behalf.

20 plaintiff also made known too then acting attorney Jane Doe^{#4} for the brooklyn defenders office standing in for Alicia briody of the incident of inappropriate touching by p.o. John doe^{#1} to the wick she was indiffrent.

Jane Doe^{#4} did not seek too protect this plaintiff from further exposure too the unsafe enviornment of the Shilo drug and theripodic program either threw the court's or by contacting staff at the Shilo theripodic program on plaintiff's behalf.

21. plaintiff reported the incident too attorney alycia briody of the brooklyn defenders services when she returned as plaintiff's acting attorney. Miss briody failed too mitigate through the court's system on plaintiff's behalf too enshure he be mandated too another and safer theripodic program.

22. plaintiff's acting attorney Alycia briody did ingvier too the shilo theripodic program staff as too plaintiff's claim of being inappropriately fondled at the location of shilo theripodic program too the wick staff affirmed plaintiff's claim but took no action on his behalf. Shilo's theripodic head psyciatrist D.R Jackson and plaintiff's assigned Counselor Jane doe^{#2} failed too inform the division of parole of parole offer's John Doe^{#1}'s actions or inshure plaintiff's safety by precautionary meashures while at the shilo theripodic program.

23. Shilo employee's violated plaintiff's eighth and fourteenth amendment right's to be free from deliberate indifference to his safety, while acting under the charter of The Shilo clinical organization.

24. The New York department of corrections, New York Queen's and Brooklyn county court's system were acting under the color of state law when he was released too the Shilo therapudic program with an active pending missdemenor warrant in to an unsafe therapudic Enviroment, and into the care of neglegent therapudic clinictions.

VI Claims of relief

A. Failure to protect

25. THE CITY OF NEW YORK'S employee's and actig agencies (Department of corrections and queen's plus brooklyn court's system employees) failed too protect plaintiff when they released him too an unsafe therapudic enviroment Violating his eighth amendment and fourteenth amendment's right's too be free from crule and unusual punishment in the form of a court mandate

26. AS a result plaintiff was subjected to crule PSYCIATRIC torture under demeaning circumstances when placed in a unhealthy mental health enviroment by the court's and the New York department of correction's both acting as agent's of the city of New York.

27. The failure of plaintiff's attorney's too protect him from exposure too unhealthy and unsafe mental health practitioners in an counterehabilitative enviroment

constituted a violation of his eighth and fourteenth amendment rights. (Miss Briody et al.)

B. Deliberate indifference to Medical needs

28. The refusal of Shilo therapeutic employees to address this plaintiff grievances in a therapeutic manner and lack of professionalism by not notifying the department of parole of officer John Doe^{#1}'s inappropriate physical contact to the person of Liverpool in a therapeutic environment constitutes a violation of plaintiff's eighth amendment rights.

29. As a result of Shilo mental health therapist's failure to provide needed therapeutic care in light of the misconduct of officer John Doe^{#1}, or a safe environment for Liverpool plaintiff suffered severe emotional and psychological trauma and injury. Therapy counselor's as known to plaintiff are: D.R. Jackson, Jane Doe^{#1}, Jane Doe^{#2}, John Doe^{#3}, resulting in medical malpractice.

30. VII Negligence of duty

The failure of defendant John Doe^{#1} to uphold the law and afford plaintiff the rights of the constitution of the United States of America therein disregarding his duty as an officer of the law to follow the code of conduct of his office while on duty in the Shilo program is a clear violation of the law and plaintiff's eighth amendment rights. in addition to his fourteenth amendment's.

31 defendant John Doe^{#1} (one) action's of placing his hand on the buttox area of Mr Liverpool while plaintiff was in a theriputic program seeking mental health counsel- ing resulted in a setback of liverpool's mental health therapy and rehabilitations, therefore causing liverpool serios mental health and emotional injuries.

VIII Relief Requested

32 WHEREFORE, Plaintiff requests that this court grant the following relief:

A. Declare that Defendant John Doe^{#1} violated Plaintiff's eighth amendment rights when he fondled Mr Liverpool in the buttox area of plaintiff's body

B. Declare that ~~the~~ mental health therapist employed at the time of the underlining incident of this complaint failed to provide a safe and healthy mental health enviroment for Liverpool resulting in malpractice of their medical Hippo- cratic oath.

C. Declare that the city of Newyork and the city of newyork employes faild to uphold the plaintiff eighth and fourteenth amendment rights by releasing liverpool to the Shilo program while he had an active warrant, resulting in a violation of those (said) rights.

D. Declare that Attorneys aforementioned Miss briody Jane- doe^{#3} and Jane doe^{#4} failed to up hold and protect Liverpool's eighth and fourteenth amendment right

as his legal representatives; in that they failed too notify the courts of the impending danger Liverpool was in at shilo treatment in the form of what constitutes to a sexual assault resulting in mental health and emotional injuries.

E. Award compensatory damages for plaintiff's physical, mental, psychiatric and emotional injuries, and punitive damages against each defendant in the amount of \$15,000,000. (1.5 million) dollars.

F. Grant plaintiff such other relief as it may appear plaintiff is entitled to.

Eric J. Laurianno
Notary Public, State of Rhode Island

ID # 62606

Commission Expiration: 9/8/2020

CTC

x Anton F. Liverpool ID # 155588

Anton F Liverpool 6-3-2019

Intake center po box 8249
cranston R.I. 02920

Affidavit or Declaration of Verification.

The affiant swears and declares that the facts stated in the above complaint are true to his knowledge and that the facts stated on information and belief are true to the best of his knowledge and belief.

pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the aforementioned and following is true and correct

x Anton Liverpool

STATE OF RHODE ISLAND

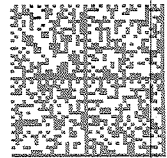
County of Cranston AFFIDAVIT of Anton Liverpool

Notary x CTC

6-4-2019

From: Anton Liverspool, 155581
Intake center, PO box 8244
Cranston, RI, 02920

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